

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Firearm Owners Against Crime,	:	No. <u>1:15-cv-322</u>
Kim Stolfer, Joshua First, <u>and</u>	:	
<u>Howard Bullock,</u>	:	
Plaintiffs	:	
v.	:	<u>(Judge Yvette Kane)</u>
City of Harrisburg,	:	
Mayor Eric Papenfuse, and	:	
Police Chief Thomas Carter,	:	
Defendants	:	Jury Trial Demanded

Amended Notice of Removal

All Defendants hereby remove this case from the Dauphin County Court of Common Pleas, Pennsylvania, to this Court:

1. On January 20, 2015, Defendants were all served with a copy of the Complaint (exhibit A). **All other filings are attached as exhibits B-M.**
2. Removal is appropriate because Plaintiffs raise a federal question.
3. Specifically, Plaintiffs bring a claim under 42 U.S.C. § 1983, asserting violations of their rights under the U.S. Constitution.
4. Federal courts have jurisdiction over claims that arise under federal laws generally, 28 U.S.C. § 1331, and more specifically over claims asserting violations of the U.S. Constitution. *See* 28 U.S.C. § 1343.
5. Accordingly, this Court has removal jurisdiction because Plaintiffs raise a federal question generally, 28 U.S.C. § 1441(a), and civil rights questions more specifically. 28 U.S.C. § 1443.

6. Pursuant to 28 U.S.C. § 1446(d), Defendants will contemporaneously serve a copy of this Notice of Removal on Plaintiffs and file this Notice of Removal with the Dauphin County Court of Common Pleas.

7. All Defendants join in the removal of this action.

8. Venue is proper because the Defendants reside in this District and the events giving rise to this action took place within this District. 28 U.S.C.A. § 1391(b).

Respectfully submitted,

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